

PETITION BY IMMIGRATION AND CUSTOMS  
ENFORCEMENT DETAINEES OF PLYMOUTH  
COUNTY CORRECTIONAL FACILITY

AS AT TUESDAY MARCH 31<sup>st</sup> 2020

WE THE UNDERSIGNED IMMIGRANTS DETAINED  
BY IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE)  
AT PLYMOUTH COUNTY CORRECTIONAL FACILITY  
HAVE PUT TOGETHER THIS PETITION THAT SEEKS  
TO ADDRESS

- (a) Our Concerns about our Safety with regards  
to the Corona Virus (Covid 19) Pandemic.
- (b) Our Recommendations as part of a possible  
solution to address our concerns.

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U.S. DISTRICT COURT  
DISTRICT OF MASS.



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## INTRODUCTION

- (1) Petitioners are currently being held in Federal Immigration Detention of Plymouth County Correctional Facility (PCCF) in the state of Massachusetts.
- (2) Sheriff JOHN D. McDONALD JR is petitioners immediate custodian.
- (3) Petitioners have been held in Immigration detentions for durations ranging from 3 months to 2 years.
- (4) Green petitioners have established:
  - (i) A well founded fear of persecution and torture if they were to be returned to their home countries.
  - (ii) Have established that their united states spouse or children will suffer severe hardship if they were to be returned to their home countries.
  - (iii) While some petitioners are in the process of establishing a credible fear.



- (5) Given petitioners have their Immigration cases pending before the following Courts.
- (i) Immigration Court;
  - (ii) Board of Immigration Appeals (BIA)
  - (iii) Courts of High Court.

## FACTS ALLEGED

(6) That given the outbreak of the deadly Corona Virus (Covid 19) Pandemic which is threatening the lives, health and safety of thousands globally and in the united states of America.

(7) That the devastation in terms of human cost caused by the Corona Virus (Covid 19) Pandemic with the tally constantly rising with approximately 180,000 Confirmed cases and almost 4000 people have died of the disease in the united states of America as at Tuesday March 31 2020.

(8) That with regards to the fact that some inmates and employees of the plymouth County Correctional facility already tested positive for the Corona Virus (Covid 19) - Boston HERALD as at Saturday 28 March 2020 Page -



Article entitled. Acta .....

(9) That with the various measures being taken by the Sheriff's office of the Plymouth County Correctional Facility which are deemed not sufficient enough to curb the spread of the virus and further protect the lives, health and safety of petitioners and thus constitutes.

(i) Continuous lockdown for 20 hours a day which is causing severe psychological problems among which increased anxiety and depression among petitioners

(ii) And with Correctional officers constantly coming from the outside and who could be thus exposed to the virus; as well as their presence in units with no protective gear (such as masks).

(10) That with the lack of Covid 19 testing facilities in detention centers and inadequate hygiene and sanitation supplies such as soap, toilet papers, cleaning detergents and sanitizers, facilities could become a spreading ground for the virus.

(11) That in accordance with measures proposed by health experts and various administrative authorities to curb the spread of the Corona Virus (Covid 19) among which social distancing and maintaining a 6 foot distance.

(12) That in a single unit in Plymouth County Correctional Facility which houses averagely 700 inmates this makes social distancing practically impossible and certainly



not achievable and consequently makes it impossible to avoid an outbreak.

(13) That in-line with prior mentioned facts petitioners are seriously fearful as they are exposed and at high risk of contracting the Covid 19 virus, which would be consequently fatal for Immigration detainees particularly those with underlying Health conditions such as Asthma, heart related diseases and in others severe cases of Anxiety and depression.

(14) Thus petitioners strongly believe their lives, health and safety are seriously at risk and cannot be effectively safeguarded due to their continuous detention during this dreadful Corona Virus (Covid 19) Pandemic which is growing exponentially.

(15) Petitioners respectfully request the,  
 (i) Department of Home<sup>Land</sup> Security (DHS)  
 Immigration and Customs Enforcement (ICE)  
 (ii) Department of Justice.  
 Immigration Courts.

To utilize other alternatives to the continuous detention of petitioners that can effectively safeguard petitioners lives, health and safety during this Corona Virus Pandemic.



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PRAYER FOR RELIEF AND POSSIBLE RECOMMENDATIONS  
Wherefore Petitioners respectfully asks for the  
GRANT of the following Relief.

EMERGENCY RELEASE OF PETITIONERS TO GUARANTEE  
THEIR WELFARE AND SAFETY

That Pursuant to 8 U.S.C. § 1226 (a) "An Alien may be arrested & detained pending a decision on whether the Alien is to be removed from the United States". Unless the Alien is removal on Criminal or terrorist grounds. The Attorney General may continue to detain or release Aliens on "Conditional Parole" or "a bond of at least \$1500".

And thus the Alien may request a bond hearing in the Immigration Courts at anytime before a removal order becomes final. 8 C.F.R. § 236.1(d)(9).

THUS PETITIONERS RECOMMEND THE FOLLOWING  
That the Federal Court should Persuade.

- (i) The Immigration Court Judges to fast track the decisions of Petitioners whose Relief decisions are still pending before the Immigration Courts or have then release awaiting their decisions.
- (ii) That in accordance with a Federal Judge's ruling that Aliens who have established a credible fear and are awaiting final Relief decisions on their cases



Pending before;

- The Board of Immigration Appeals (BIA)
  - Courts of High Circuit,
- are entitled to a bond hearing to permit them to wait out their decisions out of detention.

(a) Petitioners request the Court to persuade Immigration and Customs Enforcement to grant parole to petitioners awaiting their Appeal decisions.

(b) Petitioners request the Court to persuade the Immigration Courts and Immigration and Customs Enforcement to grant emergency bonds to petitioners entitled to Bonds to permit their release from detention while awaiting their Appeal decisions.

(c) That petitioners in the process of establishing a credible fear be granted Parole or bond.

Whereas petitioners believe these emergency actions be taken promptly to effectuate their release from detention based on the aforementioned facts to better safeguard their lives from the mortal Corona Virus (Covid 19) Pandemic before its catastrophic impact is felt on the detention facility.



PETITIONERS STRONGLY REPRESENT THE INTEREST  
 ALL DETAINED IMMIGRANTS AT PCF

# NAMES AND SIGNATURES OF PETITIONERS.

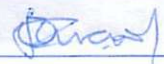



	NAMES	FACILITY ID NUMBERS	SIGNATURES
(1)	Pedro Wabibi Augusto	78781	
(2)	Pablo Navarrete	78797	Pablo N.A.
(3)	ROCARD-MBUMA	78798	
(4)	ATABONG FOSSEM PAUL	77773	
(5)	Pedro - Cuba	78323	PEDRO
(6)	Is. Alberto Perez Chavez	078803	E. A. Perez Chavez
(7)	Jorge Martinez	78359	
(8)	Maldonado Manuel	78617	
(9)	Fausto Dumaguila	78586	
(10)	Jose Luis Rodriguez Martinez	78212	Jose Luis R.
(11)	Morcos F. Chavez Chavez	78210	
(12)	Freddy Vallejos	78585	
(13)	Teo Fito Viz	78593	
(14)	Danielo Gomez Ayala	78356	
15	Manuel B. Mizhirumbay	78265	
(16)	Ricardo Ramirez	78480	RRA
(17)	Miguel Carpio	78569	
(18)	Galindo Martin	78093	
(19)	Wilmer Espinal Alvarado	76731	
(20)	Jesus Paulino Belle	78621	
(21)	Manuel Cela Caguana	78305	
(22)	Hector Iglesias Pajon Calat	78456	
(23)	Ramon Humberto Sanchez Vasquez	76595	
24	HEINRICH NAVAS RAMOS	78658	
✓ 25	Hernand Rodriguez	78794	
• 26	Leroy Daley	77629	



	NAMES	FACILITY ID NUMBERS	SIGNATURES
(27)	MICHAEL LINGA	77591	
(28)	EVEN'S DRY	77005	
(29)	HAZEM KHALIL EL BESHTAWI	78739	
(30)	RAFAEL DOS SANTOS RODRIGUES	78583	
(31)	HERNANDEZ GOMEZ JOSE RENE	78668	
(32)	VICTOR SILVA SOARES	78653	
(33)	ROBERTO PEREIRA DA SILVA	78620	
34	FELIPE DE LIMA MOREIRA BARROS	78335	
35	CARLOS EDUARDO SANTOS	78337	
36	RAMIREZ GARCIA OSCAR EDUARDO	75970	
37	REY VINICIO DE LEON	78450	
38	LOIS ZHAGNY SAETOROS	78456	
39	AHMED JEWEL	78433	
40	MYAOR ISAURO SACINTO RAMIREZ	78773	
41	NELSON TISNADO	78465	
42	KAIANY FELICIANO DA SILVA	78488	
43	JOSE HERNANDEZ	78442	
44	CLEBERSON WUADRELLI	76694	
45	BRAYAN ARANGO SEPULVEDA	76636	
46	ESQUELIN MONTILLA SOTO	78625	
47	CRISTIAN FERNANDO MARRA CHARCO	75966	
48	RIGOBERTO CASTRO CORTES	78783	
49	YOU JIA XIN	77514	
50	KAWAL PREET SINGH	75649	
51	TAREQ AHMED	76930	
52	RONNIE SSESANWA	78595	



## Names and Signatures of Petitioners.

	Names	Facility ID Number	Signatures
54	KIBERU GURASHI	77512	
55	Selemun meles	75696	
56	MOHAMMAD KAMAL AHMED	78435	KAMAL AHMED
57	ABDUR RAHIM	75055	Rahim
58	SLATINBANGU ALBANO ION	78800	
59	Santo Agustin Amador Guerrero	78214	Santo
60	Rainer Mora	78807	Raine
61	Abay Nizeyimana	77370	
62	SINGH SANDEEP	75704	SANDEEP
63	SINGH MANINDER	75692	Maninder
64	Nazim Khan	75049	Muf
65	Hossain SAKHAWAT	77172	Sakhawet Hossain



NamesFACILITY ID  
NUMBERS

SIGNATURES



Plymouth County Correctional Facility  
26 Long Pond Road  
Plymouth, MA 02360

Your Full Name / Su Nombre Llena

ATABONG TOSSEM PAUL

ID#:

7473

Unit & Room #:

C3 Room # 422

La unidad y Número del Cuarto

THIS CORRESPONDENCE IS FORWARDED FROM  
THE PLYMOUTH COUNTY CORRECTIONAL  
FACILITY. THE CONTENTS MAY NOT HAVE BEEN  
EVALUATED AND THE PLYMOUTH COUNTY  
SHERIFF'S DEPARTMENT IS NOT RESPONSIBLE  
FOR THE SUBSTANCE OR CONTENT OF THE  
ENCLOSED MATERIAL.

BRICKTON, MA 02303

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DISTRICT OF MASSACHUSETTS  
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Boston MA 02240

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